



WHITEWATER MIDSTREAM

Whistler Pipeline Project Environmental and Social Management and Monitoring Plan

Prepared by:

June 10, 2020



ISSUE AND REVISION RECORD

Revision	Date	Originator	Checker	WWM Approver	Signature of Approver	Description
0	5/29/2020	M. Thornton	D. Gibbons	H. Patterson		Draft to Client
1	6/10/2020	M. Thornton	D. Gibbons	H. Patterson		Revisions addressing Lummus Comments

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**WhiteWater Midstream, LLC
Whistler Pipeline Project
Environmental and Social Management
and Monitoring Plan
June 10, 2020**

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ACRONYMS

ABQ	USACE Albuquerque District
E&S	Environmental and Social
EMP	Ecological Management Plan
EEOC	Equal Employment Opportunity Commission
EHS	Environmental, Health and Safety
EI	Environmental Inspector
EIR	Environmental Inspection Report
EMS	Environmental Management System
EP	Equator Principles
EPA	U.S. Environmental Protection Agency
ER	Environmental Report
ESGC	Environmental, Social and Governance Coordinator
ESMMP	Environmental and Social Management and Monitoring Plan
ESMS	Environmental and Social Management System
FLSA	Fair Labor Standard Act
FW	USACE Fort Worth District
GIIP	Good International Industry Practice
GV	USACE Galveston District
H&S	Health and Safety
HDD	Horizontal Directional Drill
HR	Human Resources
KPI	Key Performance Indicator
LMRDA	Labor-Management Reporting and Disclosure Act
NCR	Non-Conformance Report
NLCD	National Land Cover Database
OP	Operational Policy
OSHA	Occupational Safety and Health Act
PPE	Personal Protective Equipment
ROW	Right-of-Way
SEP	Stakeholder Engagement Plan
SWCA	SWCA Environmental Consultants
THC	Texas Historical Commission
TPWD	Texas Parks and Wildlife Department
USACE	United States Army Corp of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
WMP	Waste Management Plan
WWM	WhiteWater Midstream

EXECUTIVE SUMMARY

The Whistler Pipeline Project is a 448-mile, 2.0 billion cubic feet per day, 42-inch diameter, natural gas pipeline mainline from the Permian Basin to the Gulf Coast of Texas. The project also includes the 50-mile Midland Lateral, six smaller pipeline laterals of various diameters, four compressor stations and 22 meter stations. Ancillary facilities also include mainline valve assemblies, launcher/receiver assemblies, riser assemblies and other appurtenances.

This Environmental and Social Management and Monitoring Plan (ESMMP) applies to the pre-construction and construction phases of the project. and has been developed to provide guidelines for environmental and social responsibility, describe stakeholder engagement, and provide internal and external grievance resolution processes. Additionally, the ESMMP and its appended documents describe the components of the environmental and social management system and the roles and responsibilities of individuals implementing the plan.

The lead federal permitting agency for this project is the U.S. Army Corps of Engineers (Albuquerque, Fort Worth and Galveston Districts); permits are being obtained under Section 404 of the Clean Water Act. Additional federal consultations are required by the U.S. Fish and Wildlife Service (Austin and Texas Coastal Ecological Services Field Offices) to comply with Sections 7 and 10 of the Endangered Species Act, the Migratory Bird Treaty Act, and the Bald and Golden Eagle Protection Act. Additional authorizations are required with the Texas Historical Commission's State Historic Preservation Office for compliance with the National Historic Preservation Act and Antiquities Code of Texas. State and local permits include those obtained from the Railroad Commission of Texas, Texas Parks and Wildlife Department, and a variety of local permits and license agreements with private or semi-private entities.

Permit conditions will be documented and strictly adhered to throughout the project. Environmental Inspectors will conduct daily inspections to confirm compliance with permit requirements throughout the construction phase. International and federal laws and regulations regarding social responsibility will be followed. This includes the Fair Labor Standard Act, Occupational Safety and Health Act, U.S. Equal Employment Opportunity Commission, Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, and the United Nations Congress on the Prevention of Crime and the Treatment of Offenders (1990). Clear processes for internal and external issues and grievances will be established and published on the project website www.whitewater.com and provided to project staff in the Employee Handbook.

Whistler's project management team will focus on specific disciplines, including administrative, health and safety, environmental and social, and construction. Each member of the project management team will monitor compliance with the various project plans, obligations and permits.

Plans and mitigation commitments identified during project development have been appended to this document. These include an Emergency Response Plan, Waste Management Plan, Traffic Management Plan, Construction Standards, Pipeline Environmental, Health and Safety Manual, and an Unanticipated Discovery Plan for cultural resources. Additional documents include letters of commitment regarding cultural resources, conservation measures and other mitigation commitments. Additionally, the Employee Handbook and human resource procedures and summaries of stakeholder

engagement meetings are provided. These materials describe how Whistler will achieve the objectives of reducing environmental and social impacts. Specific details are identified in tables in Section 5.2.

Finally, this document identifies the anticipated expenditures pertaining to environmental compliance and social responsibility, including related information detailing reporting and auditing requirements, levels of transparency, and oversight for agencies and the public.

ENVIRONMENTAL, SOCIAL AND HEALTH & SAFETY POLICY STATEMENT

As part of our commitment to our employees, contractors, customers, communities, and environment where we operate, we at WhiteWater Midstream, LLC shall confirm compliance with applicable environmental, social, health and safety regulations, and pledge to foster a robust corporate culture that goes beyond regulatory compliance; to be good stewards of the resources available for our midstream operations.

We take our environmental, social, health and safety responsibilities seriously, and consistent with our company's core values, this Environmental, Social, and Health & Safety (ESHS) Policy is a statement of our commitment to optimizing the value of the commodities we control, keeping our workers and neighbors safe, and minimizing our overall environmental impact.

WhiteWater Midstream, LLC, with the visible, effective and permanent leadership and support of the company's Senior Management, commits to:

- Comply with all applicable federal, state and local environmental, social and health and safety laws, regulations, and management standards, as well as the voluntary adoption of ESHS best practices including the Equator Principles (III) to which the company subscribes.
- Communicate this ESHS Policy with, and promote this ESHS compliance culture through, our own staff as well as suppliers and contractors, and monitor their compliance with this policy.
- Design and safely and reliably build, operate, and maintain our midstream assets with emphasis on effective process safety programs to maintain a safe work environment with the goal of preventing/eliminating accidents.
- Train employees and communicate with contractors to effectively implement a top down culture of safety awareness.
- Identify, evaluate and manage project environmental, social, health and safety risks and impacts.
- Establish and fill clear roles and responsibilities for achieving ESHS objectives and performance targets.
- Create and maintain a safe and secure working environment.
- Evaluate and continually improve our ESHS management systems, performance and training of staff and contractors.
- Communicate to management and all concerned any unlawful or unsafe conditions and security lapses.
- Maintain open communications, transparency and continued dialogue with our employees, contractors, communities, regulatory authorities, suppliers, customers, and other stakeholders.
- Continue to develop technologies and implement process enhancements to increase the performance and sustainability of our operations.

WhiteWater Midstream, LLC's Chief Executive Officer and senior management, with support from the Environmental, Social, and Governance Coordinator (ESGC), will verify conformance with this ESHS Policy and be responsible for its execution.

This policy is effective as of June 10, 2020

Revised by



Christer Rundlof
Chief Executive Officer,
WhiteWater Midstream, LLC

1. INTRODUCTION

1.1. PROJECT SCOPE

This document is the Environmental and Social Management and Monitoring Plan (ESMMP) for the Whistler Pipeline Project (the Project). The primary objective of this ESMMP is to provide guidelines for environmental and social responsibility, describe stakeholder engagement, and provide internal and external grievance resolution processes for site activities which may cause harm or nuisance. This ESMMP is intended to provide a framework to verify transparent and effective monitoring, prevention, minimization, mitigation, compensation and off-setting measures to address the environmental and social (E&S) impacts associated with the Project. Safety measures are addressed in the Construction Standards (Appendix F) and Pipeline Environmental Health & Safety (EHS) Manual (Appendix G). (Due to the familiarity of American workers with an EHS manual, it is prudent to retain the familiar title rather than change to the equivalent Occupational Health and Safety manual.)

This document supports the Environmental Reports (ERs) which have been undertaken by SWCA Environmental Consultants, ongoing stakeholder engagement conducted by Whistler Pipeline, LLC (Whistler or the Project Proponent), and technical design aspects of the project which have been prepared by Mott MacDonald.

This ESMMP should be updated and/or revised as necessary to address the prevailing conditions of the Project. Responsibilities for implementation of identified mitigation or management actions are outlined in the ESMMP and fall on either Whistler or the construction contractors. At the time of writing, Strike, Pumpco Energy Services, and Troy Construction have been selected as the pipeline construction contractors. Solar has been selected as the compressor station EPC contractor. Strike and OGT have been selected as the meter station EPC contractors.

This document is an overarching framework for environmental & social (E&S) management covering the pre-construction and construction phases. Whistler will be responsible for developing a document governing post-construction restoration and ongoing operations activities.

This document and additional supporting documentation regarding this Project can be found on the project website: www.whitewater.com.

1.2. STRUCTURE OF THE PLAN

The ESMMP is structured according to the following sections:

- Section 1: Introduction
- Section 2: Project Description
- Section 3: Legal and Administrative Requirements
- Section 4: Key Roles and Responsibilities
- Section 5: Mitigation and Monitoring Requirements
- Section 6: Implementation
- Section 7: Reporting and Auditing

1.3. OBJECTIVES AND SCOPE

The objectives of this ESMMP are to:

- Clearly describe the specific components of the environmental and social management system (ESMS) relevant to the Project
- Establish objectives for the ESMS
- Define the roles and responsibilities for implementation and maintenance of the system
- Define the actual working arrangements for environmental and social management during the site pre-construction and construction phases of the Project; the Project Proponent will be responsible for developing a document governing post-construction restoration monitoring and ongoing operations activities

This ESMMP applies to all aspects of pre-construction and construction activities. In addition, this document acts as a guide to the supporting documentation that together constitutes the environmental and social management framework for the Project activities. Responsibilities for implementation are outlined in the ESMMP. Where responsibilities fall to contractors, these may be implemented via the contractor's own ESMS which will be required to be accredited to ISO 14001:2015 or equivalent and approved by Whistler prior to use. As a minimum, contractors must comply with the Whistler ESMS including this ESMMP, and this document will be provided to the contractors.

The mitigation measures identified within this document will be implemented within the formal Whistler ESMS aligned to ISO 14001:2015 (international standard for EMS), and ISO 26000:2010 (social responsibility), or equivalent is discussed and addresses:

- Organization and responsibilities
- Training and awareness
- Emergency procedures and response
- Record keeping
- Performance monitoring, reporting and auditing
- Human rights
- Labor practices
- Fair operating practices
- Community involvement/development
- The environment
- Consumer issues

1.4. REFERENCES

The environmental and social management requirements presented in this document have been based on the following:

- Whistler environmental and social management system (ESMS), including policies, procedures, and supporting plans developed over the course of the Project as presented in the attached appendices.
- Environmental permits and consultations as presented in Table 3.1-1.
- Project site visit and data collected by SWCA from October 2019 to April 2020: including wetland delineation and cultural reports.
- The Environmental Report prepared by SWCA (December 2019).

2. PROJECT DESCRIPTION

2.1. PROJECT SETTING

Ecoregions denote areas of general similarity within ecosystems and in the type, quality, and quantity of environmental resources (U.S. Environmental Protection Agency [EPA] 2019a) and are used herein to describe the general characteristics of the Project area. Ecoregions are collective mosaics of landscape identified by alternating abiotic and biotic resources, such as geology, physiography, climate, soils, vegetation, and land use (Bureau of Economic Geology, 2010).

A hierarchical scheme distinguishes the different levels of ecological regions, with Level I as the broadest scale and Level IV as the finest subdivision of ecoregions (EPA 2019a). Level III and Level IV Ecoregions for state- and county-level scales were used to evaluate the Project. The Project crosses the following five Level III Ecoregions: Chihuahuan Deserts (24), High Plains (25), Edwards Plateau (30), South Texas Plains (31), and West Gulf Coastal Plain (34). Table 2.1-1 provides a summary of the Level III and IV Ecoregions crossed by the Project.

Table 2.1-1: Ecoregions Crossed by the Project

Level III Ecoregion	Level IV Ecoregion	Project Area by County	Texas Ecoregion Description
Chihuahuan Deserts	Chihuahuan Basins and Playas (24a)	<ul style="list-style-type: none"> • Pecos • Crane • Upton 	The Chihuahuan Deserts ecoregion extends from southeastern Arizona to the Edwards Plateau in central Texas. This ecoregion has physiography of basin and range terrain with alternating mountain ranges near the Texas-New Mexico border. This ecoregion includes desert flats and valleys, bolson drainages, plateaus, and sand hills. These support cactus savannas, shrublands, and grassland vegetation communities. Vegetative cover consists of semi-desert grassland and arid shrubland.
High Plains	Arid Llano Estacado (25k)	<ul style="list-style-type: none"> • Crane • Upton • Midland • Glasscock • Reagan 	The High Plains ecoregion encompasses the panhandle of north Texas and northeastern New Mexico. This ecoregion consists of smooth to slightly irregular plains and is characterized by cropland and agricultural fields. Annual precipitation (less than 20 inches) is generally collected within small depressions of the landscape which accumulate to form seasonal playa lakes. Prevalent agricultural land use in this ecoregion has hydrologically modified these depressions, but they naturally function as shallow recharge wetlands. Due to limited precipitation, these playa habitats support migrating waterfowl, shorebirds, amphibians, and small mammals.

Level III Ecoregion	Level IV Ecoregion	Project Area by County	Texas Ecoregion Description
Edwards Plateau	Semi-arid Edwards Plateau (30d)	<ul style="list-style-type: none"> • Upton • Reagan • Crockett • Val Verde 	This ecoregion is a unique region underlain by Cretaceous limestone, sandstone, shales, and dolomite substrates, which supports a network of streams and karst topography. This portion of the ecoregion has a semi-arid climate with seasonally intermittent streams, primarily sustaining shrub and short grass vegetation. Landscape profiles also include sharp hills and canyons due to rockfall (erosion) of mesas. This is in contrast to rounded hills in the east that are weathered by greater annual precipitation.
Southern Texas Plains	Semiarid Edwards Bajada (31b)	<ul style="list-style-type: none"> • Val Verde • Kinney 	This ecoregion contains a wide expanse of rolling to moderately dissected plains, grasslands, and isolated forests. This ecoregion is supported by erratic annual precipitation, with peak rainfall primarily occurring in spring and fall seasons. The native landscape is characterized by thorny brush, such as mesquite and short grassland, due to its history of fire suppression, grazing, and rangeland. The Southern Texas Plains exhibit a diverse landscape, due to its central placement with the Chihuahuan Desert to the west, Tamaulipan thornscrub to the south along the Rio Grande River, and transition of wetter coastal grasslands to the east. As such, this ecoregion is subdivided by Level IV ecoregions: Semiarid Edwards Bajada (31b), Texas-Tamaulipan Thornscrub (31c), and Northern Nueces Alluvial Plains (31a).
	Texas-Tamaulipan Thornscrub (31c)	<ul style="list-style-type: none"> • Kinney • Maverick • Zavala • Dimmit • La Salle • McMullen • Duval 	
	Northern Nueces Alluvial Plains (31a)	<ul style="list-style-type: none"> • Zavala 	
Western Gulf Coastal Plain	Southern Subhumid Gulf Coastal Prairies (34b)	<ul style="list-style-type: none"> • Jim Wells • Nueces 	This ecoregion has characteristically flat topography which naturally supports agricultural cropland and native grassland vegetation. Traversing inland, the coastal prairies become more irregular as the landscape strata changes from the lower Beaumont Formation to higher Lissie Formation. The Beaumont Formation contains clay textured soils with high shrink-swell properties, while the Lissie Formation has well-draining sandy clay loam textured soils.

Sources: Bureau of Economy Geology (2010), Texas Parks and Wildlife Department (2019a), Griffith et al. (2007).

The Project begins in the Chihuahuan Deserts (24) ecoregion, which extends from southeastern Arizona to the Edwards Plateau in central Texas. This ecoregion includes Pecos, Crane, and Upton Counties and accounts for 12.8 percent of the project area. Most of the Project is located east of the Pecos River and consists of basins and playas that extend towards the Stockton Plateau. Trans-Pecos characteristics, such as mountainous elevations and Chihuahuan woodlands, are located west of the Project. The Whistler Pipeline and Midland Lateral then converge into the Edwards Plateau (30) ecoregion. The Whistler Pipeline continues through the western portion of the Edwards Plateau, while

the Midland Lateral extends north into the southern portion of the High Plains (25) ecoregion. Project counties of this ecoregion include Crane, Upton, Midland, Glasscock, and Reagan Counties, and account for approximately 10.4 percent of the Project area. The natural landscape of this ecoregion consists of irregular grasslands, dominated by grama-buffalo grass, which transitions to Trans-Pecos scrub savanna further south. Although this landscape is dissected by cropland, grazing pastures, and oil and gas activities, the Project area is mainly surrounded by oil and gas fields. The Project continues east through central Texas, transecting the southwestern portion of the Edwards Plateau (30) ecoregion. This ecoregion includes Upton, Reagan, Crockett, and Val Verde Counties and accounts for 28.5 percent of the project area. The Project area crosses through the uplifted and elevated region of the Edwards Plateau itself, which is west of the Edwards Aquifer and accompanying underground karst features (Texas Parks and Wildlife Department [TPWD] 2019a). Within this ecoregion, the plateau landscape exhibits a drier climate with fewer seasonally intermittent streams.

The Southern Texas Plains (31) ecoregion dominates the Project area as it houses the southeastern half of the Whistler Pipeline. Encompassing approximately 44.2 percent of the Project area, this ecoregion includes Val Verde, Kinney, Maverick, Zavala, Dimmit, La Salle, McMullen, and Duval Counties. According to the National Land Cover Database (NLCD) (U.S. Geological Survey [USGS] 2019a), scrub-shrub vegetation dominates the Project area averaging 85.7 percent within these counties. Scrub-shrub is typically drought-tolerant, thorny vegetation that forms dense understories. Grasslands (5.6%) and pastures (0.2%) are also present, contributing to the largely rural landscape. The Project concludes within the West Gulf Coastal Plain (34) ecoregion, accounting for 3.8 percent of the Project area. In contrast to western counties of the Project, those within the West Gulf Coastal Plain have been primarily converted for agricultural uses, such as cropland, pastures, and grazing. According to the NLCD (USGS 2019a), the Project area in Jim Wells and Nueces Counties averages 71.7 percent of cultivated crops and 6.28 percent pastures.

2.2. PROJECT OVERVIEW

Whistler proposes to construct and operate the Project, an intrastate natural gas pipeline extending from Pecos County to Nueces County, Texas (Figure 2.2-1). The Project is a 2.0 billion cubic feet per day, 42-inch diameter, dry natural gas pipeline from the Permian Basin to the Gulf Coast constructed to provide relief to Permian Basin natural gas takeaway constraints.

The Whistler Pipeline would extend approximately 448 miles from the Waha Gas Hub near Cayanosa, Pecos County, Texas, and terminate near Agua Dulce, Nueces County, Texas. The proposed Project crosses the following 17 Texas counties:

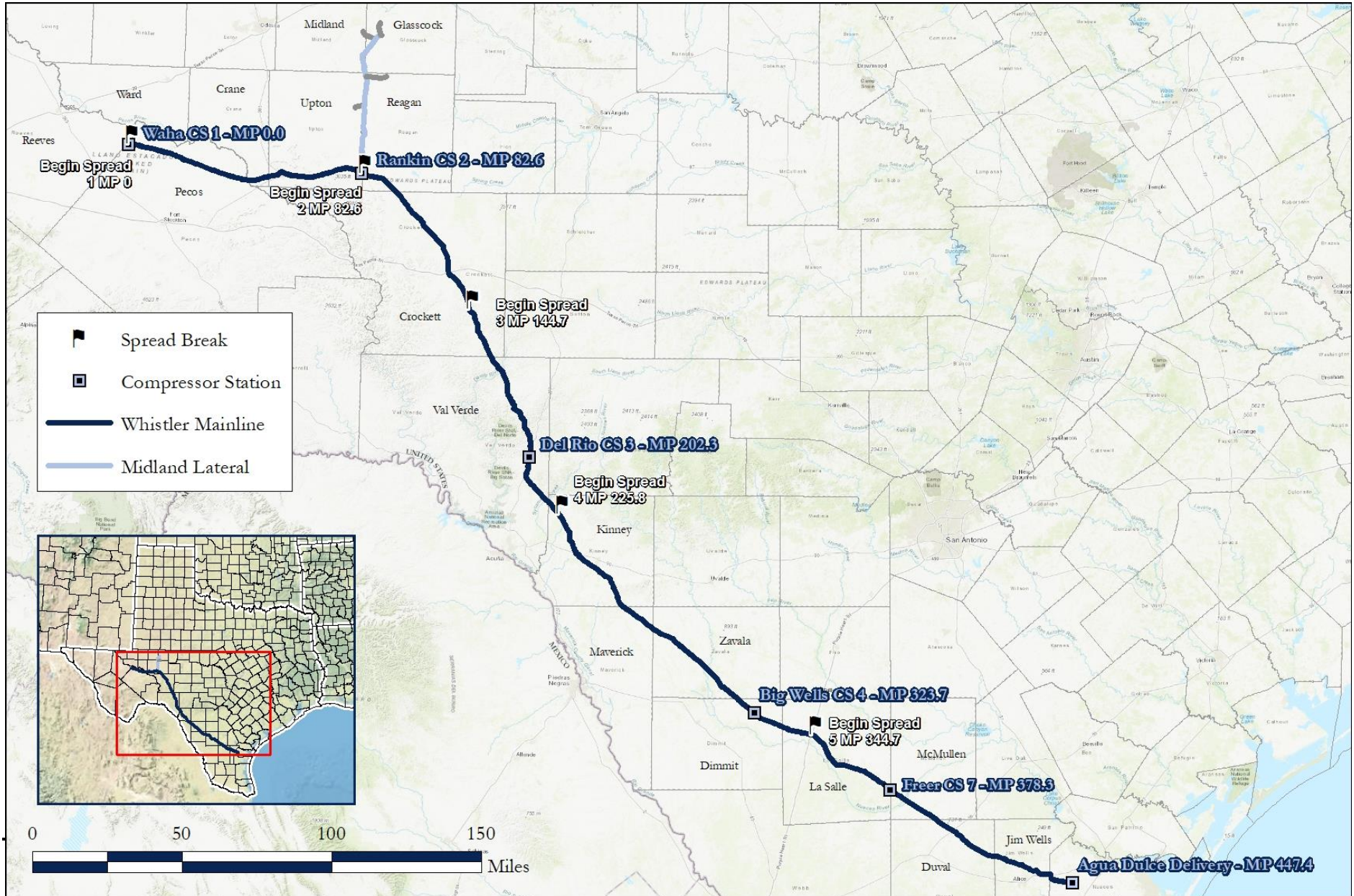
- Pecos
- Crane
- Upton
- Midland
- Glasscock
- Reagan
- Crockett
- Val Verde
- Kinney
- Maverick
- Zavala
- Dimmit
- La Salle
- McMullen
- Duval
- Jim Wells
- Nueces

The Project also includes the Midland Lateral, six smaller laterals, and four compressor stations (Table 2.2-1). The Midland Lateral is an approximately 50-mile lateral that extends from near Garden City, Glasscock County, TX to the Rankin Compressor Station in Upton County, TX. The Project also includes a variety of ancillary facilities and sites, including 22 meter stations, 44 launcher/receiver sites, 27 mainline valve sites, and 9 temporary contractor yards.

Table 2.2-1: Whistler Pipeline and Facilities

Category	Pipeline/Facility	County	Diameter	Length/Acreage
Whistler Pipeline	Whistler Mainline	15 counties	42-inch	448 miles
	Agua Dulce Extension	Nueces	36-inch	1.84 miles
Laterals	Midland Lateral	4 counties	36-inch	50 miles
	Rebel Lateral	Glasscock	12-inch	4.10 miles
	Navitas Lateral	Midland, Glasscock	16-inch	5.18 miles
	Targa Driver Lateral	Midland	12-inch	0.23 miles
	Pembrook Lateral	Upton	12-inch	3.50 miles
	WTG Sonora Lateral	Upton, Reagan	12-inch	0.51 miles
	JEB Lateral	Upton	12-inch	1.10 miles
Compressor Stations	CS-1 Waha	Pecos	N/A	13.96 acres
	CS-2 Rankin	Upton	N/A	7.40 acres
	CS-3 Del Rio	Val Verde	N/A	3.85 acres
	CS-4 Big Wells	Dimmit	N/A	5.70 acres

Figure 2.2-1: Project Location



2.2.1. PROGRAM FOR DEVELOPMENT

Figures 2.2-2 and 2.2-3 illustrate the key program schedule dates and durations of activities by pipeline, compressor stations and metering facilities.

Figure 2.2-2: Milestones for Key Pipeline Project Activities

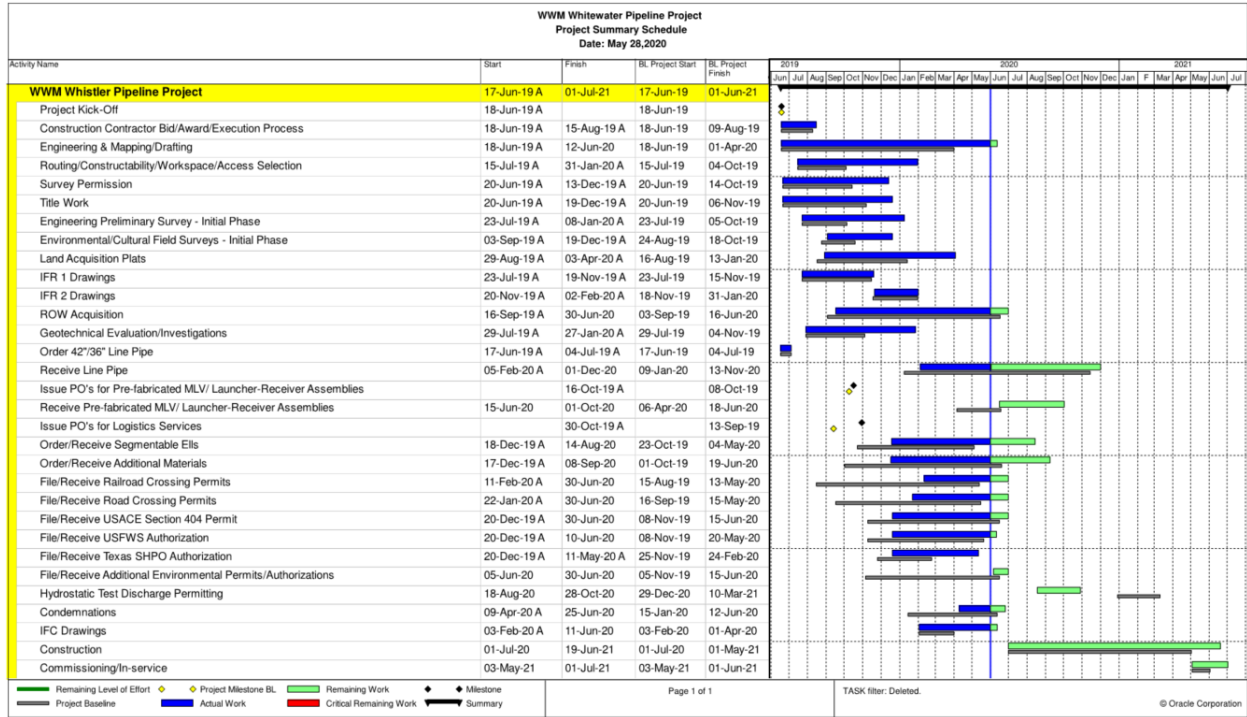
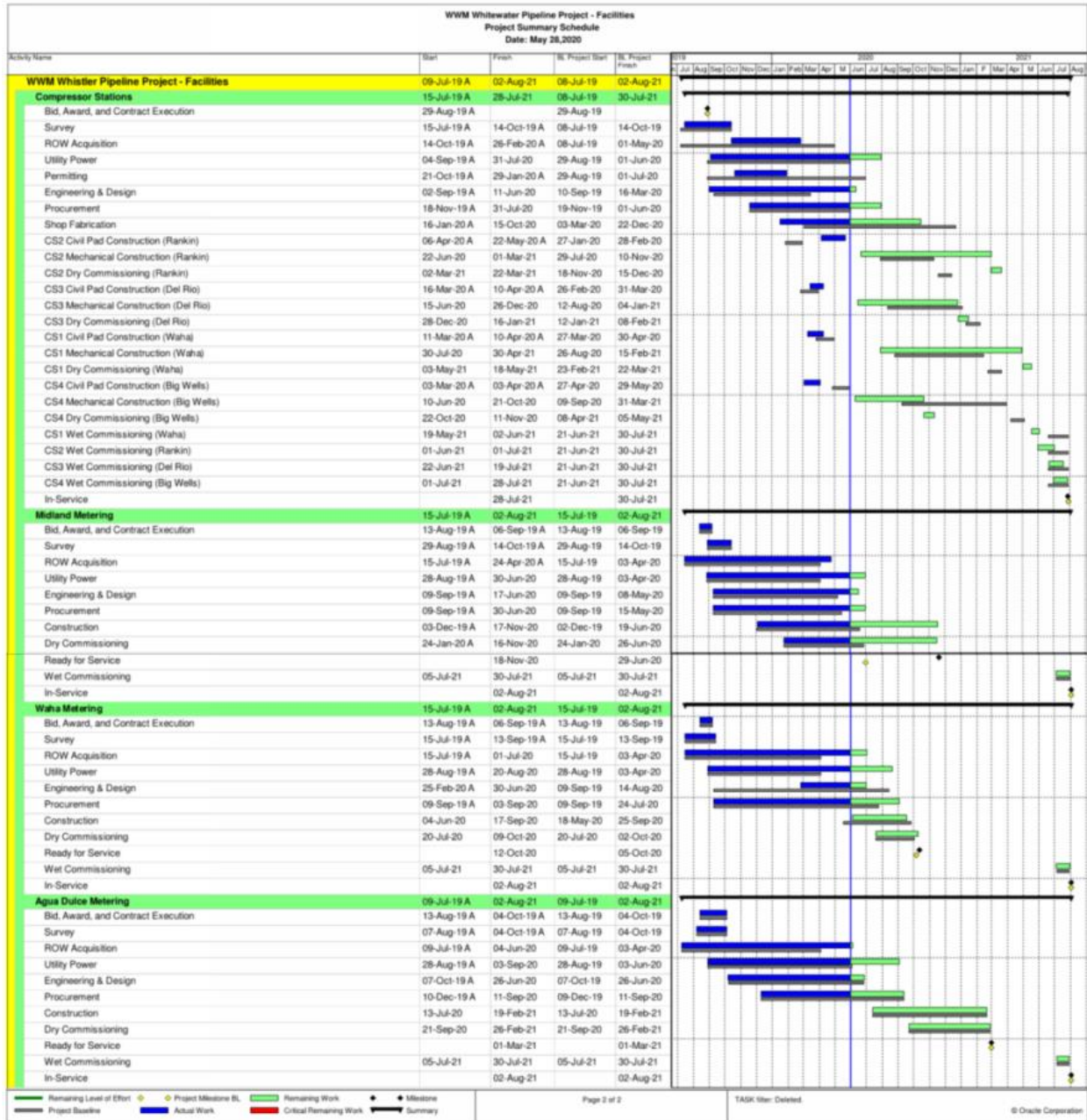


Figure 2.2-2: Milestones for Key Compressor and Metering Station Project Activities



3. LEGAL AND ADMINISTRATIVE REQUIREMENTS

3.1. NATIONAL

Table 3.1-1 provides an overview of applicable federal, state, and local environmental permits, clearances, and authorizations that are required for the Whistler Project. The conditions included therein would be in addition to the information covered in this ESMMP.

Table 3.1-1: Required Project Permits, Clearances and Authorizations as of 6/10/2020

Agency	Permit, Approval or Authorization	Projected/ <i>Actual</i> Filing Date	Projected/ <i>Actual</i> Receipt Date
U.S. Army Corps of Engineers: Albuquerque (ABQ), Fort Worth (FW), and Galveston (GV) Districts	<ul style="list-style-type: none"> Clean Water Act, Section 404 Permit 	<ul style="list-style-type: none"> ABQ: 12/20/2019 FW: 12/20/2019 GV: 12/20/2019 	<ul style="list-style-type: none"> ABQ: 2/24/2020 FW: 6/15/2020 GV: now planning no impacts to Waters of the US and therefore no Section 404 permit required. <p>Note: Permitting timeframes and methodologies may be subject to revision dependent on additional agency coordination activities.</p>
U.S. Department of Interior Fish and Wildlife Service (USFWS) Austin and Texas Coastal Ecological Services Field Offices	<ul style="list-style-type: none"> Consultation regarding compliance with Sections 7 and 10 of the ESA Migratory Bird Consultation under Migratory Bird Treaty Act 16 U.S.C. 703-711 and Section 3 of Executive Order 13186, Bald and Golden Eagle Protection Act 	<ul style="list-style-type: none"> 12/20/2019 	<ul style="list-style-type: none"> 6/15/2020
Texas Historical Commission/SHPO	<ul style="list-style-type: none"> Section 106, National Historic Preservation Act Coordination Antiquities Code of Texas (applicable due to crossing of University of Texas administered lands) 	<ul style="list-style-type: none"> ABQ: 12/20/2019 FW: 1/31/2020; 4/13/2020 GV: 12/20/2019 	<ul style="list-style-type: none"> ABQ: 2/7/2020 FW: 3/4/2020; 5/11/2020 GV: 2/10/2020

Agency	Permit, Approval or Authorization	Projected/ Actual Filing Date	Projected/ Actual Receipt Date
Railroad Commission of Texas	<ul style="list-style-type: none"> • P5 Organization a Report • T4 Permit: Application for permit to operate a pipeline in Texas • Hydrostatic Test Discharge Permit (TXG670000) • Drilling Mud Landfarm Permit • PS-48: New Construction Commencement Report 	<ul style="list-style-type: none"> • 6/15/2019 • 7/10/2019 • 8/1/2020 • 6/15/2020 • TBD 	<ul style="list-style-type: none"> • 7/3/2019 • 7/22/2019 • 10/1/2020 • 6/30/2020 • TBD
Texas Parks and Wildlife Department	<ul style="list-style-type: none"> • PWD-994 Individual Permit: Marl, Sand, Gravel, Shell, or Mudshell Permit 	<ul style="list-style-type: none"> • 6/15/2020 	<ul style="list-style-type: none"> • 6/30/2020
Texas Pacifico, Union Pacific Railroad, Crystal City Railroad, KCS Railroad	<ul style="list-style-type: none"> • 9 - Railroad Crossing Permits 	<ul style="list-style-type: none"> • 2/11/2020 	<ul style="list-style-type: none"> • 6/30/2020
Various Counties	<ul style="list-style-type: none"> • 139 - Road Crossing Permits 	<ul style="list-style-type: none"> • 1/22/2020 	<ul style="list-style-type: none"> • 6/30/2020

National labor management standards applicable to the Project include:

- Fair Labor Standard Act (FLSA) of 1938, for wages and overtime pay
- Labor-Management Reporting and Disclosure Act (LMRDA) of 1959 for relationship between unions and their members
- Texas Labor Code-Worker’s Compensation Act
- Occupational Safety and Health Act (OSHA)
- Laws enforced by the U.S. Equal Employment Opportunity Commission (EEOC) related to protection against any type of discrimination (i.e., Title VII of the Civil Rights Act [1964], the Pregnancy Discrimination Act, the Equal Pay Act [1963], the Age Discrimination in Employment Act [1967], Title I of Americans with Disabilities Act [1990], amongst others)

Although the project will not be hiring Law Enforcement Officials or guards, any staff acting as temporary guards in any of the project facilities will adhere to the following regulations:

- Code of Conduct for Law Enforcement Officials, United Nations General Assembly, Resolution 34/169, December 17, 1979

-
- Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, United Nations Congress on the Prevention of Crime and the Treatment of Offenders, September 7, 1990

Project facilities have been designed in accordance with USDOT 49 CFR Part 192 “Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards”, as regulated by the Pipeline and Hazardous Materials Safety Administration (PHMSA). Other applicable industry codes, regulations, standards and specifications have been accounted for in the design process.

3.2. INTERNATIONAL

The Project will be undertaken in accordance with the international treaties and conventions ratified by the United States as relevant to the Project, including those related to biodiversity, climate change, species protection and labor rights. The Project will also comply with the Equator Principles, 2013 (EP III).

3.3. INSTITUTIONAL ARRANGEMENTS

3.3.1. OVERVIEW

It is the responsibility of Whistler and the construction contractors to make certain this ESMMP is followed, to verify the Project does not cause unacceptable impacts on the local environment or communities. This ESMMP will be updated or revised to address prevailing conditions. Responsibilities for the implementation of identified mitigation or management actions may fall to various actors. It is the responsibility of Whistler to oversee and monitor the implementation of relevant ESMMP elements by the construction contractors, drilling contractors, other contractors and subcontractors. All contractors will be responsible for implementing the site-specific ESMMP via their own environmental management system (which must meet the minimum requirements of the Project environmental and social management system). Both Whistler and the construction contractors will appoint Environmental, Health and Safety (EHS) specialists to oversee, monitor and audit work. Subcontractors will be responsible for implementing task specific activities in line with the Project ESMMP at a minimum and in accordance with their own or the lead contractor systems and procedures.

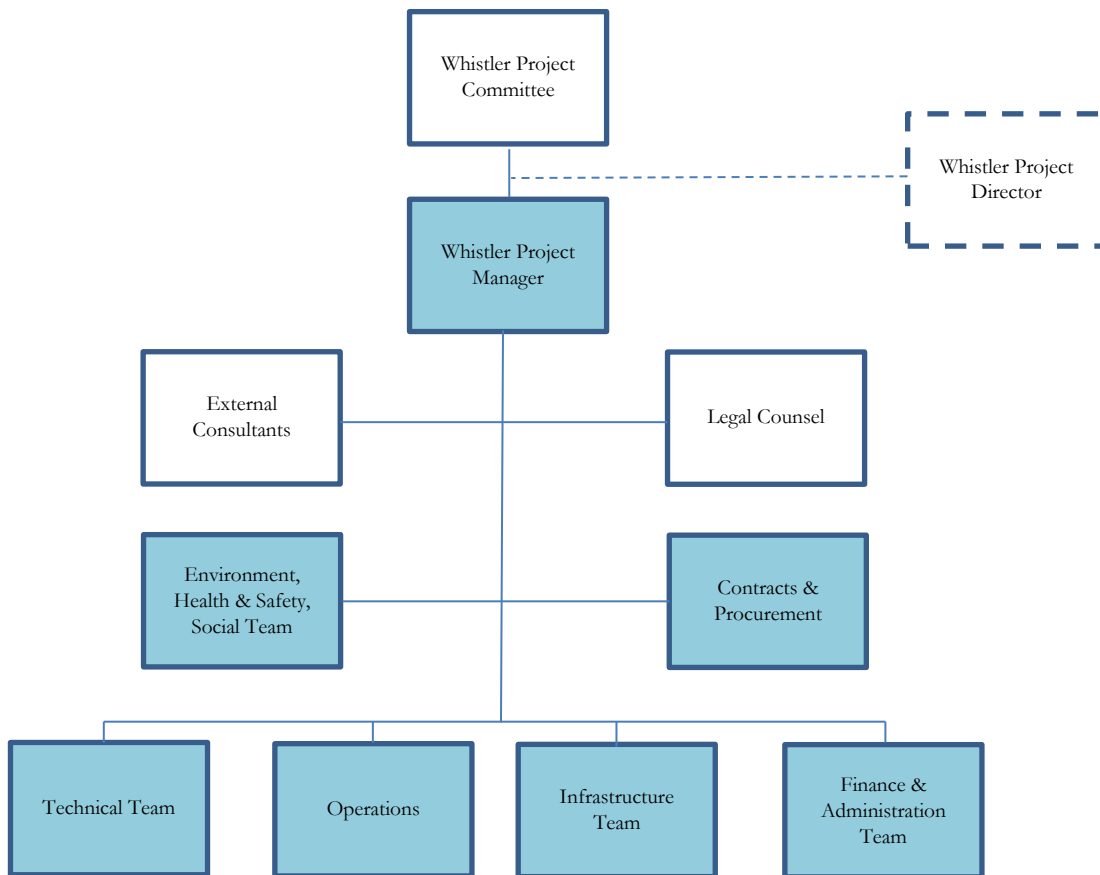
The next sections outline in more detail the anticipated roles and responsibilities of Whistler and contractor staff.

4. ROLES AND RESPONSIBILITIES

4.1. WHISTLER MANAGEMENT

Whistler has established a Project Management Team to address construction, environmental and socio-economic issues (refer to Whistler’s organizational structure in Figure 4.1-1).

Figure 4.1-1 Whistler Project Team Organizational Structure



Whistler will be the key party responsible for implementing the ESMMP through their Project Management Team, which includes:

- Whistler Project Manager – responsible for general oversight of the Project and providing direction to the Project team, listed below. The Project Manager also serves as the Incident Commander as “Area Manager” as described in the Emergency Response Plan, or has the authority to designate an individual to be the Incident Commander.
- Whistler Construction Manager – responsible for construction monitoring, contract conformance, administration of construction contractors, and confirming compliance with technical, environmental and compliance requirements. The Construction Manager will be on-site regularly.
- Whistler Health and Safety Coordinator – responsible for overseeing health, safety and security during construction.
- Whistler Environmental, Social and Governance Officer (ESGC) – responsible for overseeing compliance with environmental policy and monitoring compliance of the Project. The ESGC will verify compliance with the obligations set out in the applicable law, this ESMMP and environmental permits on a day-to-day basis. In addition, this individual will oversee social aspects for the Project, including managing community liaison officer responsibilities for stakeholder engagement and grievance mechanism redress, and verifying that labor rights are being upheld.
- Whistler Environmental Inspectors – responsible for monitoring the construction contractor to verify environmental compliance on the Project.

The main tasks of these key roles are described below.

4.1.1. WHISTLER PROJECT MANAGER

- Attend meetings with Project team as required.
- Engage and interface with project managers from consultants, contractors and other applicable parties.
- Prepare and implement action plans to enable completion of project activities including project management/controls, engineering, survey, GIS/mapping, right-of-way, environmental/cultural, permitting, procurement, construction and construction management/inspection.
- Manage activities, budget, costs, schedule, QA/QC and risk management.
- Conduct meetings with the project team.
- Approve project deliverables.
- Mitigate project risks and proactively manage project conflicts.
- Document the scope of work and approve changes.
- Establish, develop and lead the project team.
- Manage costs and resources.
- Identify and manage project risks.
- Assure technical/professional quality of work.
- Organize on-time completion of deliverables.
- Maintain project records with the project controls lead.
- Assign project staff responsibilities and engage subconsultants.
- Coordinate QA/QC.

4.1.2. WHISTLER CONSTRUCTION MANAGER

- Interface with Project Manager and construction management team.
- Manage construction management team.
- Supervise construction controls team and Chief/Lead Inspectors.
- Lead construction management team for construction contract administration/conformance, project controls, change management, materials management and reporting.
- Verify implementation of construction management and inspection plan.
- Facilitate meetings to review project status and review issues with Whistler, project leads, contractors, and other stakeholders.
- Review and approve Request for Information (RFI) submissions from construction contractors.
- Verify construction management personnel have completed the required safety training and that Health and Safety Plans are prepared/implemented.
- Verify project record drawing and close-out packages are completed in accordance with scope requirements.
- Coordinate documentation of final inspections and punch-list items for contractor resolution.
- Monitor and document contract provisions for adherence to contractual requirements.
- Communicate contractual deficiencies to Whistler and its contractors.
- Facilitate identification, communication, and resolution of outstanding contractual matters.
- Facilitate routine meetings with Whistler, contractors and applicable parties.
- Facilitate training sessions regarding contract conformance related items.
- Monitor for Non-Conformance Reports (NCRs) and maintain NCR log.
- Initiate and monitors Corrective Action Requests (CARs).
- Coordinate with project team, in resolution of contractual issues as they arise.

4.1.3. WHISTLER HEALTH AND SAFETY (H&S) COORDINATOR

- Take prime responsibility for practical implementation of safety management.
- Oversee and verify implementation of the safety management plans (with support from the Contractors' Superintendent) and verify all contractors and sub-contractors are in compliance with safety requirements.
- Oversee and report safety performance to the Contractors' Superintendent.
- Provide oversight and management of the system of issuing Safe Work Permits and Lock Out/Tag Out Permits
- Coordinate regular audits and inspections to verify that committed impact mitigation measures are being implemented.
- Act as first point of contact on safety matters for government authorities, other external bodies, and the general public.
- Interface with Whistler, construction management/inspection team, and construction contractor safety personnel.
- Coordinate with Construction Manager, Chief Inspector, and field managers on safety awareness and protocols.
- Perform routine safety audits and provide applicable documentation.

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- Lead preparation of Whistler emergency response plans.
 - Monitor construction contractor safety performance and communicate items for resolution to Whistler and construction contractors.
 - Lead preparation of overall safety reporting.
 - Encourage positive intervention and near-miss reporting.
 - Communicate lessons learned and value-added safety recommendations.
 - Participate in investigations of any incidents and monitor implementation of corrective actions.

4.1.4. WHISTLER ENVIRONMENTAL, SOCIAL AND GOVERNANCE COORDINATOR (ESGC)

- Take prime responsibility for practical implementation of environmental management.
- Oversee and verify implementation of the ESMMP (with support from the Contractors' Superintendent and confirm all contractors and sub-contractors are in compliance with the ESMMP requirements.
- Oversee and report environmental performance to the Contractors' Superintendent.
- Review Contractors' and subcontractors' environmental protection/mitigation measures to verify compliance with the ESMMP.
- Coordinate regular audits and inspections to check that committed impact mitigation measures are being implemented.
- Act as the first point of contact on environmental matters for government authorities, other external bodies, and the general public.
- Receive reports from the Contractors' Superintendent regarding any ESMMP non-compliances.
- Oversee regular environmental awareness training and assist personnel in applying environmental standards on site.
- Oversee regular audits and inspections to check that committed impact mitigation measures are being implemented.
- Oversee environmental monitoring on wetlands and water resources, cultural resources, endangered species, and erosion/sediment control measures.
- Maintain overall responsibility for social issues governed by the ESMMP, stakeholder engagement plan (SEP) and other social subplans, as applicable.
- Act as main point of contact for community stakeholders to request information or to lodge grievances, which the ESGC must process and work to resolve in a timely and satisfactory manner according to the Project's grievance mechanism.
- Organize meetings with stakeholders (except for media), especially landowners, any local group leaders, elected officials and appointed local authorities to provide a regular opportunity to discuss any issues or concerns.
- Produce annual summaries that provide details related to community investment activities and the use of the grievance mechanism.

4.1.5. WHISTLER ENVIRONMENTAL INSPECTORS

Whistler anticipates that pipeline construction will generally be accomplished using five mainline spreads with three construction contractors. The Midland Lateral will also be constructed by one of the mainline contractors. Additional contractors will be responsible for constructing the compressor stations and meter stations. Whistler will generally utilize one Environmental Inspector (EI) per spread to oversee environmental compliance inspection. Additional EIs will be engaged for facility construction as needed. EIs will report to the ESGC, and to the Chief Inspectors on a functional pipeline spread/facility level. Daily Project coordination and environmental compliance communication will occur with the Construction Managers, Chief Inspectors, and Construction Contractor Superintendents/Foremen.

The EIs will perform a key field role in coordinating environmental compliance requirements, overseeing resolution of compliance issues, identifying construction activities or changes that require increased levels of inspection presence, and coordinating communications with contractor representatives. The EIs will have stop-work authority. The EIs will have inspection duties and other coordination duties which include:

- Assist in the development of training programs and materials.
- Perform environmental inspection on the applicable construction work areas and provide direction on permit requirements.
- Review Project environmental inspection reports (EIR) for quality and consistency and advise the inspection staff on resolution of non-compliance issues.
- Coordinate with construction and right-of-way (ROW) management personnel to verify implementation of Project requirements.
- Provide leadership in communicating environmental responsibilities and requirements, safe work practices, and teamwork to the environmental inspection team.
- Perform day-to-day coordination with the Construction Superintendent and construction inspection staff.
- Coordinate with construction inspection staff and contractor representatives daily to verify that the pipeline and facility work sites are marked and flagged as required prior to construction progressing through an area.
- Plan in advance of construction activity to identify and anticipate situations where environmental compliance issues might arise and to assist in preventing such situations.
- Address and resolve compliance issues.
- Coordinate with agency representatives on a regular basis to address agency concerns, maintain positive and effective communications with agency representatives, and facilitate agreements in the field.
- Communicate frequently with the ESGC regarding permit requirements and interpretation, required agency notifications, and compliance issues and resolution.
- Provide supplemental information to the ESGC in a weekly status report.
- Oversee environmental training activities.
- Provide oversight on the conservation measures that have been negotiated with the USFWS for endangered species.

Cultural resource specialists will verify that exclusion fencing is correctly positioned to protect sites, provide environmental training on cultural resources to staff, and be on-call to respond to unanticipated discoveries of cultural resources or human remains in accordance with the Project's Unanticipated Discovery Plan. Cultural resource specialists will also conduct additional surveys, if needed, for Project variance requests and to coordinate with agencies regarding cultural resources as needed. EPs will coordinate with applicable parties for any unanticipated cultural discoveries during construction. A full-time on-site cultural monitor will not be utilized.

4.2. CONSTRUCTION CONTRACTORS

All construction contractors will be responsible for verifying that performance of the Project complies with the ESMMP, all applicable laws relating to environment or social management, and good industry practice with respect to environmental and social matters.

Key environmental and social management requirements of the main contractors will include:

- Implement the requirements of the ESMMP as defined in sections below.
- Provide construction plans that identify approved project workspaces.
- Produce management plans and method statements relating to key activities that include specific reference to the mitigation requirements contained herein during Project progression.
- Provide all training necessary to oversee and implement ESMMP requirements.
- Maintain responsibility for complying with ESMS management and coordination procedures.
- Provide dedicated personnel to confirm that all environmental related construction requirements are adhered to.
- Require third-party subcontractors to implement relevant requirements of the construction ESMMP or follow lead contractor policies and procedures.
- Hold temporary permits, notification of works, and documentation required to support permit implementation.

The key tasks of the main contractor ESMS roles are described below.

4.2.1. CONTRACTORS' SUPERINTENDENT

The construction contractors' Superintendent is responsible for addressing construction issues in the field and overseeing construction work. Additional responsibilities include, but are not limited to:

- Facilitate daily and weekly construction meetings with members of the Project team.
- Verify that construction progress and schedule performance are being reported on a daily, weekly, and monthly basis as appropriate.
- Verify prompt recognition and appropriate reporting of any issues pertaining to construction activities that might lead to budgetary overruns or delays to critical path elements of the schedule.
- Coordinate all construction staking survey efforts with the survey crews.
- Work closely with the ESGC to verify that environmental measures are incorporated and any apparent issues are being communicated to the appropriate personnel.
- Verify compliance with ESMMP specifications, permit conditions, construction contracts, and applicable codes.

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- Communicate with the EP's regularly to evaluate and improve implementation of the environmental compliance management program throughout construction.
 - Address cases of noncompliance with the Contractor's foreman and management personnel.
 - Provide leadership by integrating environmental responsibilities into all levels of the project construction organization.
 - Review and evaluate higher level variance requests with the ESGC.
 - Aid the Environmental Inspectors (EP's) in compliance with construction, safety, and environmental mitigation measures identified in Project permits and plans.
 - Set the standard for environmental responsibility and expectations for construction by the Contractors.
 - Aid the EP's in verifying that the construction foreman and laborers maintain environmental compliance during construction and compliance issues are addressed and resolved.
 - Confirm that EHS specialists are adequately qualified to understand and implement the ESMMP.

4.2.2. CONTRACTOR EHS SPECIALIST(S)

The construction contractors will be required to demonstrate adherence to the applicable measures included in this plan as part of construction and installation operations. Contractors will be required to appoint dedicated EHS specialists to verify that the applicable elements of this plan are being met.

4.2.3. CONTRACTOR PERSONNEL

The contractors have significant responsibilities for compliance with the Project's environmental and social requirements. The foremen will be accountable for verifying that the Project is constructed in an environmentally responsible manner and in accordance with all Project environmental permits, conditions, plans, and agency requirements during all day-to-day construction activities. Key environmental responsibilities for the contractor's supervisory staff include, but are not limited to:

- Verify that all laborers attend environmental training prior to beginning work on the Project.
- Review and understand the environmental permits, conditions, plans and agency requirements.
- Implement environmental protection measures to meet permit conditions and requirements during construction.
- Verify work is performed in compliance with Whistler specifications, contract documents, environmental permits, approvals, plans, and landowner line list conditions.
- Respond to the Construction Superintendent's and EP's requests and directives to verify compliance with Project requirements.

4.2.4. SUBCONTRACTORS

The contractor's management team will be responsible for verifying subcontractors' performance, including confirming that subcontractors are adequately informed of the requirements of the ESMMP and can adhere to the requirements. Contractors will verify that their subcontractors are fully aware of all the environmental laws, occupational health and safety regulations, and social responsibility and labor rights requirements that must be implemented. Contractors will be expected to identify the procedures for monitoring and reporting on subcontractor performance.

4.3. PERMIT REQUIREMENTS AND MONITORING

All required permits, licenses and authorisations required prior to the commencement of construction will be provided to the contractors in a permit manual. The permit manual must be on-site and will provide direction regarding permitted construction requirements including roles and responsibilities. It is the responsibility of the contractors to read, understand and comply with the requirements of the permits and other agency approvals. Whistler will provide an environmental inspection team to confirm compliance with these permits.

Any new permit commitments will be added to the permit manual and included on the Landowner Construction Line List if requirements apply to specific land parcels. In addition, any landowner commitments will be included on the Landowner Construction Line List as easements are negotiated. Whistler will notify the relevant authorities prior to the start of Project construction activities. Temporary permits have been identified as necessary for the proposed works including those listed in Table 4.1-1.

Table 4.1-1: Responsibility for Temporary Permits

Permit	Responsibility
PS-48: New Construction Report for Texas Railroad Commission	Whistler
Texas Railroad Commission Minor Permits (e.g., drilling mud landfarming, hydrostatic test water discharge) – may need to be resubmitted if permits expire during construction	Whistler
Landowner specifications and access notifications (per agreements) stored in construction line list	Whistler

5. PLANS AND PROCEDURES

5.1. OVERVIEW

This section addresses Project resources topically and their corresponding construction management and mitigation requirements identified during the permitting process. Table 5.1-1 summarizes these topical resources, their location in this ESMMP and the party responsible for developing the supporting plans.

Specific supporting documents and plans have been attached as appendices. For convenience a list of these appendices is provided below:

- Appendix A – Emergency Response Plan/Pollution Incident Control Plan (Contingency Plan)
- Appendix B – Traffic Management Plan (to be provided by construction contractors)
- Appendix C – Waste Management Plan
- Appendix D – ES Social Management Plan (Human Resources Procedures)
- Appendix E – Pipeline EHS Manual
- Appendix F – Construction Standards
- Appendix G – Social Policies and Ethics
- Appendix H – Section 404 Permits (ABQ, FW) and Avoidance Measures (GV)
- Appendix I – Conservation Measures and Commitments (USFWS) (removed for public consumption due to sensitive information)
- Appendix J – Cultural Commitment Letters (removed for public consumption due to sensitive information)
- Appendix K – Unanticipated Discovery Plan
- Appendix L – Greenhouse Gas Report
- Appendix M – Stakeholder Engagement Summaries

Table 5.1-1: Project Requirements and Responsibilities

Location in ESMMP	Resource Type/Supporting Document	Development Responsibility
5.2-1	General environmental and social management (Appendix F, M)	Whistler
5.2-2	Air quality management	Whistler
5.2-3	Surface water management including water quality (Appendices A, C, F, I, and J)	Whistler
5.2-4	Noise management	Whistler
5.2-5	Landscape and visual management	Whistler
5.2-6*	Traffic and transport management (Appendix B)	Construction Contractors
5.2-7	Land contamination, materials and waste management (Appendices A, C, and F)	Whistler
5.2-8	Social management (Appendices A, E, F, G, and M)	Whistler
5.2-9	Ecological mitigation and management (Appendices A, D, H, and I)	Whistler

Location in ESMMP	Resource Type/Supporting Document	Development Responsibility
5.2-10	Archaeology and cultural heritage management (Appendices J and K)	Whistler
5.2-11	Occupational health and safety management	Whistler

Note: Items denoted with an asterisk (*) are not fully developed because they require contractor-specific input; however, the associated table provides minimum guidelines that the Contractors must include in their final plan prior to construction.

In certain circumstances the contractors are responsible for completing site-specific plans; in these cases, Whistler has provided minimum standards and guidelines that the contractors must incorporate into their supporting plans. Whistler will review and approve all contractors’ respective plans and procedures to verify continuity with Whistler requirements before any work commences.

5.2. GENERAL ESMMP

The following sub-sections summarize individual Project actions and specific mitigation and construction monitoring requirements associated with each general resource type and provide a framework for complying with requirements identified in this ESMMP. However, it is noted that specific requirements are found in the supporting documents found within each appendix.

Table 5.2-1: General Site Environmental and Social Management

Objective	Activity	Action	Responsibility	Timescales	Monitoring/KPI
Comply with permit requirements	Environmental permits	Develop permit matrix (see Table 3.1-1).	Whistler	Before/during permitting activities	Monthly checking
Implement construction industry best management practices	Notification of construction	Plan ahead and give regulators advanced notice of construction start. Have permit handbooks on-site which include emergency contacts for regulators at project trailers. Personnel training regarding environmental compliance.	Whistler	Pre-construction	Monthly updates
	Selecting and managing contractors and sub-contractors	Contractors to provide EHS plans prior to mobilization. Verify sub-contractors have a copy of the ESMMP prior to mobilization. Verify sub-contractors attend environmental training session. Establish relationship with Contractors and Environmental Inspection team who will monitor the performance of Contractors/sub-contractors during the project.	Whistler and Contractors	Pre-construction	Proof of checks, training records Site inspection records
	Management and site control	Nominate persons within contractor's organization with defined responsibility for EHS role in Project. Require all method statements to include EHS requirements. Through relevant training, verify everyone on site is aware of their responsibilities and liabilities with respect to the environment. Through site induction, make staff and visitors aware of Project environmental issues and environmental standards. Display environmental resource signage at key work sites prominently.	Whistler and Contractors	Pre-construction and throughout construction	Environmental Inspection team daily monitoring and weekly reporting
			Adequately protect primary work sites against vandalism, theft and breakage. Contractor to be responsible for security of the ROW and facility sites at all times while the services are being performed. Secure the worksites daily.		
	All site works	Establish a safe working environment with an environmental health and safety (EHS) plan that addresses potential hazards, identifies preventive and protective measures, including training and use of PPE, and describes documentation and reporting of accidents, diseases and incidents (see Table 5.2-11 for additional details about EHS).	Contractors	Throughout construction	--
Liaison with the local communities	Identify the key local representatives and keep them informed of progress (Appendix M).	Whistler	Pre-construction through construction	Complaints register Monthly audits Communication records	

Objective	Activity	Action	Responsibility	Timescales	Monitoring/KPI
		Display notice board at the perimeter of facility work sites stating contact details in the event of a complaint or comment.	Whistler and Contractors		Daily site walk-around
		Implement the requirements of the grievance mechanism and stakeholder engagement plan (SEP).	Whistler		Grievance logs
		Address complaints as they arise and in accordance with the defined complaints procedure. Create a log of complaints and verify they are properly followed up on and resolved.	Whistler		Grievance logs Number of complaints
	Security (inside facility sites)	Develop and implement a site safety and security management plan based on a risk assessment (See Table 5.2-8 on social management for additional details). Do not stack materials against the inside or outside of a site boundary. Secure work sites and equipment to prevent vandalism. Verify all laborers have been issued a helmet sticker to clearly identify they have received EHS training prior to being allowed on site; all laborers must display this sticker to be allowed on site.	Whistler and Contractors	All times	Daily site walk-around
		Verify all security staff are appropriately vetted and trained about use of force, the security plan, and emergency response.	Contractors	Before employee starts work	Training records
Verify general site housekeeping and environmental protection	Daily and weekly site inspections of ROW and facility sites	ROW and facility sites will be inspected by the EI team on a daily basis.	Whistler and Contractors	Throughout construction	Site inspection records Number of complaints Target zero

Table 5.2-2: Air Quality Management

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
Minimize fugitive dust and other emissions	Earthworks, material handling	Provide personal protective equipment to workers on site, such as dust masks where dust levels are likely to be excessive. Locate spoil and topsoil stockpiles away from human receptors (residential areas) or other environmentally sensitive areas (wetlands/waterbodies). Cover, seed or fence stockpiles to prevent wind erosion. Keep stockpiles for the shortest possible time. Consider the prevailing wind direction when siting stockpiles to reduce the likelihood of affecting sensitive receptors. No open burning. Minimize material handling and avoid double handling.	Contractors	Throughout construction	Site inspection records

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
		Sealing or restoring completed areas of the ROW or facility sites as soon as reasonably practicable after completion. Verify all vehicles carrying loose or potentially dusty material to/from the site are fully covered. Verify that the engines of all vehicles and drilling equipment on site are not left running unnecessarily. Minimise dust generating activities. Use water as a dust suppressant where applicable. Control site runoff of water or mud.			
Minimise NOX, PM10, SO2 emissions	Active construction	Abide by permit requirements for compressor stations. Use of modern vehicles to the degree possible to minimize emissions of construction equipment. Minimize vehicle/equipment mileage to the extent practicable. No air emissions testing is required.	Contractors	Throughout construction	Site inspection records

Table 5.2-3: Surface and Groundwater Management Including Water Quality

Objective	Activity	Action	Responsibility	Timescales	Monitoring / KPI
Minimise impact on natural water resource use and contamination	Trench dewatering	No surface or groundwater dewatering without prior approval/permits from authorised body. Establish dewatering sites in well vegetated upland areas with appropriate ECDs.	Contractors	Throughout construction	Site inspection records Permit requirements met
	All construction activities with the potential to result in spillage of fuels, lubricants, concrete and other toxic materials	No direct discharges to wetlands or waterbodies. Manage silt laden runoff from the ROW or facility sites. Implement temporary and permanent ECDs on the ROW and at facility sites.	Contractors	Site establishment	Site inspection records
	Access roads	Provide adequate waterbars on access roads to avoid altering drainage paths or damming waters and causing flooding.	Contractors	Throughout construction	Site inspection records
	Drainage	Design storm water drainage systems in line with the U.S. technical norms and to take account of future climate variability.	Whistler and Contractors	Prior to construction	Site inspection records

Objective	Activity	Action	Responsibility	Timescales	Monitoring / KPI
	Equipment and vehicle maintenance	Undertake equipment and/or vehicle maintenance off site where feasible to prevent potential for releases and spills of oils/solvents/hydrocarbons.	Contractors	Throughout construction	Site inspection records

Table 5.2-4: Noise Management

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
Avoid nuisance generated by daytime construction affecting closest sensitive receptors	Site establishment	<p>The contractor will prepare a site-specific noise control plan as applicable for residential receptors. (No noise monitoring is required.) It should include the following general methods of noise control:</p> <ul style="list-style-type: none"> • The selection of low noise machinery and equipment, using equipment with lower comparative sound power levels where possible. • Equipment to be examined on a daily basis for defect prior to the start of works and under no circumstances should defective equipment be used. • Avoid unnecessary revving of engines. • Equipment to be switched off when not in use. • General construction activities should be limited to daytime working hours, where possible (drilling activities are exempt from this condition). • Machinery and equipment to be positioned as far as possible from sensitive areas/residential receptors. <p>Site operatives to be briefed in keeping noise to a minimum.</p> <ul style="list-style-type: none"> • Locating static equipment (e.g., generators) to take advantage of any screening to break the line of sight from receptors. • Laborers to be briefed in keeping noise to a minimum. • Identify and implement appropriate Personal Protective Equipment (PPE) requirements. 	Contractors	Throughout construction	Site inspection records Records of any noise complaints
	Construction traffic	<p>Limit vehicle speeds on site and access roads, particularly close to residential receptors.</p> <p>Traffic should be managed to avoid the need for traffic to queue up.</p> <p>Schedule timing of deliveries to avoid disturbance near populated areas.</p> <p>Maintain access roads to minimize washboards on road surfaces which may give rise to vehicle body noise and rattle.</p>	Contractors	During construction	Site inspection records Records of any noise complaints

Table 5.2-5: Landscape and Visual Management

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
Minimise adverse impacts on viewsheds and landscape character	Site establishment	<p>Keep construction traffic to a minimum especially near residential receptors.</p> <p>Implement good housekeeping practices including daily trash clean-up.</p> <p>Set out a material management plan to minimise the number of vehicle movements required.</p> <p>Minimize ROW disturbance as far as practicable.</p> <p>Permanent facility sites should be painted to match the color pallet of the surrounding area.</p>	<p>Whistler</p> <p>Contractors</p>	Throughout construction	Site inspection records

Table 5.2-6: Traffic and Transport Management

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
Minimize road hazards, congestion and damage to road infrastructure	<p>Site establishment</p> <p>HDD</p> <p>Construction</p>	<p>Contractors to develop a final Traffic Management Plan for Whistler review.</p> <p>Adoption of best transport safety practices across all aspects of Project operations with the goal of preventing traffic accidents and minimising injuries suffered by Project personnel and the public. Measures should include:</p> <ul style="list-style-type: none"> • Emphasising safety aspects among drivers. • Improving driving skills and requiring appropriately licensed drivers. • Adopting limits for trip duration and arranging driver rosters to avoid overtiredness. • Avoiding dangerous routes and times of day to reduce risk of accidents. • Regular maintenance of vehicles and use of manufacturer approved parts to minimise potentially serious accidents caused by equipment malfunction or premature failure. <p>Where the Project may contribute to significant increase in traffic along existing roads, or where road transport is a significant component of a project, the following measures should be implemented:</p> <ul style="list-style-type: none"> • Minimising pedestrian interaction with construction vehicles. • Coordination with emergency responders to verify that appropriate first aid is provided in the event of accidents. • Wearing PPE for workers on foot. • Locating secondary project components such as worker accommodation close to project work sites and arranging worker bus transport to minimising external traffic. • Employing safe traffic control measures, including road signs and flag persons to warn of dangerous conditions. 	<p>Contractors</p> <p>Whistler</p>	Pre-construction through construction	<p>Site inspection records</p> <p>EHS statistics and incident reporting relating to traffic incidents</p>

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
		In the case of a traffic accident, local police or State Troopers should be contacted depending on location.			

Table 5.2-7: Land Contamination, Materials and Waste Management

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
Reduce the use of raw materials/ potentially finite and or scarce resources	Pre-construction	Implementing good housekeeping and operating practices, including inventory control to reduce the amount of waste. Implementing procurement measures that recognise opportunities such as ordering the correct amount of materials to be delivered when needed.	Contractors	Procurement and staging	N/A
Appropriate spoil handling and disposal	Construction	Topsoil and overburden will be carefully removed from each of the proposed spoil disposal sites and stockpiled nearby to use for backfill, as required.	Contractors	Construction	EI site inspection records
Minimisation, safe handling, storage and disposal of waste	Pre-construction and construction	Waste Management Plan will be followed: Project team will keep a clean working environment and control waste at all times. Waste management planning: identify and characterise the source of all waste streams from the Project with the proposed final disposal option. Recycling will be conducted when possible. The disposal of wastewater and HDD mud must be permitted. All waste material will be segregated into non-hazardous and hazardous wastes for consideration for re-use, recycling, or disposal.	Whistler Contractors	Construction	Waste monitoring/ tracking records EI site inspection records
Prevention of leaks, spills and environmental incidents	Site establishment	Follow the emergency response plan (Appendix A). Establish procedure for reporting any environmental incidents related to spills / leakages and how to deal with any spills / leakages. Follow EHS manual (Appendix F). Provide specialist training in appropriate procedures to persons with hazardous materials or waste management responsibilities. Maintain an inventory of hazardous materials and specific procedures/ controls. Maintain available copies on site of Material Safety Data Sheets (MSDS) for all hazardous substances used during the Project. Provide copies of all MSDS for all hazardous substances used during the Project to Whistler. If there are specific waste and hazardous materials storage areas they must have:	Whistler Contractors	Construction	Emergency Plans Discuss plans at safety tailgate meetings Site inspection records

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
		Fire extinguisher available at all times. Located next to any required PPE (as necessary for irritants and hazardous materials). Spill kits available at all times.			

Table 5.2-8: Social Management

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
Prevention of adverse impacts on local communities	ROW Acquisition	Conduct public outreach meetings in the local communities. Conduct fair negotiations with landowners. Honor commitments made to landowners who make agreements with Whistler. Coordinate with local municipalities. Workers to sign the code of conduct and adhere to professional behavior, as applicable.	Whistler Right-of-Way Consultants	Pre-construction	Monitoring of commitments
Provide environmental awareness	Education awareness and training	Prepare a training plan to address: Awareness to be sensitive to general environmental impacts of the Project as well as the environmental impact of specific tasks. Knowledge to guide implementation of environmental management procedures.	Whistler Contractors	Pre-construction and construction	Monitoring of training plan
Protect construction site and landowner property	Site Access and Security plan	Whistler in collaboration with Contractors to prepare a security strategy for site prior to construction. The plan will: <ul style="list-style-type: none"> Identify the types of security issues and risks. Describe access and control of equipment and procedures (for instance signage, gates and fencing, lighting, landowner issues, agency coordination, etc.). 	Whistler Contractors	Throughout construction	Site inspection records
Positive stakeholder relationships	Coordinate and stakeholder engagement	Continue to engage with the local community and landowners (Appendix M). Respond to phone calls, emails, and concerns.	Whistler	Throughout construction	Monitoring of community engagement

Table 5.2-9: Ecological Management

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
Minimize disturbance to sensitive habitats	Pre-construction	Conduct a wetland and waterbodies survey and sensitive habitat survey to support permitting. Conducted design efforts to avoid and minimize impacts.	Whistler Contractors	Prior to construction and during construction	CWA 404 permits will be obtained for the

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
		Minimize removal of vegetation when possible.			portions of the project required
Minimize impacts to wetland and waterbodies	Construction	Clean Water Act Section 404 permits will be followed (Appendix H). SWPPP documents will be followed to prevent unfiltered stormwater from entering wetlands. Emergency Spill Response plan will be maintained and followed with spill kit equipment will be kept on hand at all construction locations. Areas of refueling will have safety measures followed to prevent spills and leaks. Spill kits and fire extinguishers will be located adjacent to these refueling areas. Vehicles will be regularly cleared to reduce the potential for spreading invasive species into the project area.	Whistler Contractors	During Construction	Weekly inspections by EIs and following storm events. Tailgate briefing will provide reminders of various environmental topics on a regular basis
Minimize disturbance to endangered species	Pre-construction Construction	Use habitat survey and endangered species survey to support permitting and develop consultation plan. EHS staff will conduct training the potential endangered species within the project area staff should be aware of. Follow conservation plan for the Gulf Coast Jaguarundi and Ocelot (Appendix I). Relocate the fishhook cactus (endangered species) outside of the project corridor. Reduce speed of construction vehicles and watch for animals. Do not harass wildlife within and around the project areas.	Whistler	Prior to construction and during construction	EHS staff will conduct training EIs will conduct weekly field audits Any encounters will be reported per the USFWS plan

Table 5.2-10: Archaeology and Cultural Heritage Management

Objective	Activity	Action	Responsibility	Timescales	Monitoring/ KPI
Reduce risk of site clearance activities encountering significant archaeological site	Pre- site establishment	Undertake archaeological survey including subsurface testing was conducted for project are where required. Developed mitigation in consultation with Texas Historical Commission (THC) and USACE to avoid and minimize impacts to eligible and potentially eligible cultural resources. Archaeologist to review location of exclusion fencing around culturally sensitive sites prior to construction.	Whistler supported by approved local archaeological specialist	Prior to construction and during construction	Concurrence letter from THC
Manage potential unexpected discovery of archaeological remains/artifacts	Construction	Develop and implement Unanticipated Discovery Plan that includes the following requirements: Immediately stop work. Notify nominated person on site. Contact relevant cultural authorities.	Civil works contractor Whistler Archaeologist	Prior to and during site establishment and drilling	Chance find reports and notifications to relevant cultural authorities

Objective	Activity	Action	Responsibility	Timescales	Monitoring/ KPI
		Implement recommendations in accordance with requirements. Resume works under the supervision of the relevant cultural authorities.			

Table 5.2-11: Occupational Health and Safety Management

Objective	Activity	Action	Responsibility	Timescale	Monitoring / KPI
On-site health and safety	Education and training	Applicable on-site personnel are required to have conducted basic employment trainings such as blood borne pathogen training, MSDS training, and safety training appropriate for their jobs. Daily tailgate meetings will be conducted to focus on daily health and safety for daily activities, items unique to the location, items for awareness (weather, animals, new construction areas, etc). Submittal of safety observations and safety interventions to help keep team safe. Read and review EHS Plan.	Employers, EHS staff	Duration of Project	Project records of safety training Daily records of tailgate meetings Record of safety interventions
	Site Safety	Have all appropriate safety signage and fencing around the ROW and permanent facility sites. Utilize flaggers, vehicle spotters and other support staff when needed to operate equipment in a safe fashion. Provide training to laborers regarding biologicals such as snakes, insects and other animals.	EHS staff, contractors	Duration of Project	Construction Standards EHS Plan Traffic Management Plan

6. IMPLEMENTATION AND FUNDING

6.1. WHISTLER ENVIRONMENTAL POLICY AND COMMITMENT

The Project will be undertaken with adherence to Whistler’s environmental policy (see Environmental, Social and Health and Safety Policy Statement and www.whitewater.com), the main commitments of which include:

- Comply with all applicable environmental legislation, as well as the voluntary adoption of environmental best practice practices; verifying that both suppliers and contractors comply with this policy.
- Provide adequate training to staff, encouraging the development and implementation of good environmental practices in processes and activities.
- Implement and continuously improve the Environmental Management System (EMS) aimed at the prevention of pollution and the protection of the environment.
- Disclose its environmental policy, both internally and externally.

6.2. FUNDING

Budgetary estimates for the required environmental and social measures are provided in Tables 6.2-1 and 6.2-2.

Table 6.2-1: Estimation of Environmental Protection Measures

Project ESMMP Implementation Costs	Indicative Cost (USD)
Environmental management system, monitoring, evaluation (component 1)	██████████
Environmental/cultural field surveys, mitigation plans and permitting	██████████
Environmental training and capacity building	██████████
Emissions controls	██████████
Biological monitoring during construction	██████████
Environmental inspection activities	██████████
Cultural resource monitoring	██████████
Environmental construction clean-up and restoration	██████████
Management requirements (personnel, signage, pollution prevention equipment, waste receptacles, PPE, erosion/sediment control measures, wetland/waterbody protection measures, waste disposal costs, etc.)	██████████
Independent audits	██████████
Total	██████████

Table 6.2-2: Social Mitigation Estimations

Project ESMMP Implementation Costs	Indicative Cost (USD)
Recruitment plan and related initiatives	██████████
Workforce training programmes	██████████
Security training	██████████
Stakeholder engagement plan implementation, ongoing stakeholder engagement activities	██████████
Communications plan	██████████
Landowner post-construction restoration commitments	██████████
Total	██████████

7. REPORTING AND AUDITING

7.1. OVERVIEW

An integral part of an ESMS is the reporting of information back to management and to all staff. The following sections establish minimum reporting and auditing standards. All contractors and sub-contractors will be required to adhere to this reporting framework throughout construction as applicable.

7.2. PERFORMANCE REPORTING AND AUDITING

Table 7.2-1 summarises the key reports to be produced in support of the Project. Any third parties working on behalf of Whistler will be required to set up systems within their own ESMS for reporting that addresses the basic framework identified below.

Table 7.2-1: Minimum Reporting Requirements

Report Type	Requirements
Accident / incident and non-compliance report (NCR)	Any breaches of the accepted standards specified will be reported to the Whistler Construction Manager. All accidents, incidents and EHS near misses shall be reported.
Site inspection records	Whistler and all contractors are to compile a site inspection checklist to record information relevant to their ESMMP implementation responsibilities. Alongside routine daily visual inspections, periodic site inspections are to be undertaken and recorded weekly to confirm ongoing compliance with ESMMP requirements.
Monthly internal EHS reports	Relevant parties will prepare a monthly report for submission to Whistler’s ESGC and include: <ul style="list-style-type: none"> • Progress in implementing the ESMMP. • Findings of the inspection and monitoring programs, with emphasis on any breaches of the control standards, action levels or standards of general site management; reported back to staff to improve environmental performance/behavior. • Outstanding NCRs. • Summary of any complaints by external bodies and actions taken/to be taken.
Internal audits	Undertaken every six months to review the adequacy of implementation of Contractors’ ESMMP in accordance with the requirements stated in this report.
Incident reports for biological or cultural impacts	Any impacts to cultural sites, wetlands or endangered species will follow the individual plans set forth in the permit requirements.
Progress reports	Contractor weekly progress reports to Whistler. Includes construction progress, budget progress, any safety incidents, near misses, and positive interventions, land parcels accessed during the week, any interactions with the public, and other issues that may be identified to the project. This document guides the weekly meeting.

Report Type	Requirements
Incident reporting/OSHA requirements	<p>Report all contractor-related incidents to Whistler’s operations management or supervisors in accordance with Section 12 and Appendix I of Whistler’s Incident Reporting Standard.</p> <p>Each contractor employee (including subcontractors’ employees) shall notify Whistler site management and the contractor supervisor as soon as practical of any injury or illness sustained while performing work in the Whistler work environment.</p> <p>The supervisor shall then make the appropriate notifications in accordance with the Incident Reporting and Timeline (Appendix I of the Incident Reporting Standard) if the condition was potentially caused or aggravated by the work environment.</p> <p>The supervisor is accountable for completing the initial report form for any injury or illness, including first aid cases, for both employee and contractor injuries. Any fatality associated with Whistler’s operations shall be reported up to the Director of Operations immediately up to within one hour.</p> <p>Injuries and illnesses that meet OSHA’s guidelines for recordability shall be recorded on OSHA’s Form 300, “Log of Work-Related Injuries and Illnesses,” and Form 301, “Injuries and Illnesses Incident Report.” Recordable injuries shall be added to the OSHA 300 log within seven days after the Supervisor has learned about an incident.</p> <p>a) If the work-relatedness of an injury or illness is questionable, the incident shall be recorded on the OSHA 300 log within seven days but may later be lined out if an investigation of the injury or illness has determined it to be not work-related.</p> <p>b) The OSHA forms 300 (log) and 301 (report) shall be kept up to date. The Supervisor is responsible for this requirement for all employees considered based at the facility.</p>

7.2.1. DOCUMENT HANDLING

In accordance with Whistler document control procedures, a complete and up-to-date file of all relevant sources of information will be maintained in electronic format only accessible by authorized personnel. Any printed documents will be labeled “uncontrolled”. Electronic files will include:

- Current environmental permits and consents.
- All relevant regulations, international guidelines, and codes of practice.
- Latest version of the ESMMP.
- Records for environmental monitoring (inspection forms) and audits.
- Correspondence in relation to environmental matters / permits including internal and external
- Environmental training records (e.g., attendance records for environmental awareness training).

7.2.2. SUPERVISION, INSPECTION AND AUDITING

In accordance with Whistler’s internal audit plan, the Whistler EHS team will establish procedures to supervise and measure the effectiveness of the management system. This should be through a combination of inspections and audits (internal and third-party). This should be done by experienced

experts and relative to the nature of the risks. Whistler and the contractors will be required to develop an incident register and implement corrective actions.

7.2.2.1. MONITORING AND SUPERVISION OF CONTRACTORS’ MANAGEMENT OF LABOR AND WORKING CONDITIONS

Whistler will be responsible for verifying that the required labor standards are passed on to all Contractors and subcontractors. Whistler will verify implementation of written commitments and procedures through monitoring and supervision activities, especially but not limited to those presented in Table 7.2-2.

Table 7.2-2: Minimum Reporting Requirements

Timing / Phase	Labor aspect	Indicator of contractor compliance	Methods for Whistler verification
Within two months of contractor commencing construction	Labor management recruitment Labor force data	Contractor human resource policy based on non-discrimination, equal opportunity and fair treatment that is compliant with the national labor law. Staff members conversant on the human resource policy.	Contractors’ HR plans.
One month prior to start of contract	Occupational health and safety	Contractor H&S plan in place that has provisions to provide a safe and healthy work environment by preventing accidents, injuries and diseases; verifies workers are trained; and includes emergency prevention measures and response actions.	Contractors’ H&S plans in project file.
During construction	Working conditions and terms of employment	Written employment contract for each worker. Appropriate shelter and shading. Break times adhere to national law. Provision of timely payment of salaries. General information regarding terms and conditions, Project activities and occupational health and safety information provided at an established location on site.	Periodic random interviews with employees regarding contract and working conditions. Visual inspection of PPE use. Daily visual inspections of eating, resting, drinking and washing facilities.
During construction	Labor grievance	Workers aware of labor grievance mechanism. Use of grievance mechanism.	Random interviews with employees. Periodic discussion with contractors; HR department.

Timing / Phase	Labor aspect	Indicator of contractor compliance	Methods for Whistler verification
During construction	Occupational health and safety	Number of training sessions and number of trainees. Accident registers up to date on sites with number of accidents (Whistler will encourage sub-contractors to meet zero accidents and fatalities target). Regular reporting of EHS statistics to Whistler for central collation. Proper use of PPE. Safe and hygienic eating, resting, drinking and washing facilities.	Accidents reported in contractors' progress reports as applicable. Regular (minimum weekly) visual inspections of sites and use of PPE.

7.2.2.2. ENVIRONMENTAL MONITORING

Environmental performance indicators required to be monitored during the course of the Project are outlined in Table 7.2-3.

Table 7.2-3: Environmental Monitoring

Measure	Frequency	Method	Responsibility
General Environmental Best Practices during Pipeline Construction	Daily	Dedicated environmental inspection	Environmental Inspectors and Whistler ESGC
Erosion & Sediment Controls	Daily	Dedicated environmental inspection	Environmental Inspectors and Whistler ESGC
Wetland & Waterbody Construction Procedures	Daily	Dedicated environmental inspection	Environmental Inspectors and Whistler ESGC
Permit Conditions	Daily	Dedicated environmental inspection	Environmental Inspectors and Whistler ESGC
Environmental Clean-up and Restoration	Daily	Dedicated environmental inspection	Environmental Inspectors and Whistler ESGC

7.2.2.3. GENERAL AWARENESS TRAINING

To fulfil the requirements of an ISO 14001 EMS, all staff members involved on the Project will be required to attend educational training that includes general environmental awareness in relation to the Project. At a minimum, this training will address the following:

-
- General understanding of the environmental permit requirements and resource avoidance measures associated with the Project.
 - Explanation of the Whistler Environmental Policy and its practical implementation, stressing that it carries implications for Project staff.
 - Any specific resource concerns.
 - Emergency preparedness and response.
 - Natural hazard risks.
 - Stakeholder engagement and interaction policy.
 - Labor grievance mechanism.

7.2.2.4. SUB-CONTRACTOR TRAINING REQUIREMENTS

All contractors will be required as part of the request for tender for the works to provide an overview of their training provisions and make training records of key staff available for review upon request as part of the internal auditing process for the Project for any specialist disciplines.

7.3. COMMUNICATION

Communication requirements for the Project are to be set out in the Stakeholder Engagement Plan (SEP). The contractors' plans will be required to take account of the SEP.

Appendix A – Emergency Response Plan / Pollution Incident
Control Plan (Contingency Plan)

Appendix B – Traffic Management Plan

To be provided by construction contractor

Appendix C – Waste Management Plan

Appendix D – ES Social Management Plan (Human Resource Procedures)

Appendix E – EHS Manual

Appendix F – Construction Standards

Appendix G – Social Policies and Ethics

Appendix H – Section 404 Permits (ABQ, FW) and Avoidance
Measures (GV)

Appendix I – Conservation Measures and Commitments (USFWS)

Removed for public consumption due to sensitive information

Appendix J – Cultural Commitment Letters

Removed for public consumption due to sensitive information

Appendix K – Unanticipated Discovery Plan

Appendix L – GHG Emissions Report

Appendix M – Stakeholder Engagement Summaries